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July 26, 2021

## **VIA ECF**

The Honorable Marian W. Payson  
United States Magistrate Judge  
United States District Court  
Western District of New York  
100 State Street  
Rochester, NY 14614

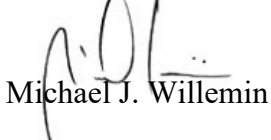
Re: Doreen Raimondi v. Avaya, Inc., et al.; Case No.: 20-cv-06566

Dear Judge Payson,

We represent Plaintiff Doreen Raimondi in the above-referenced matter and write jointly with Defendants to respectfully request that the remaining deadlines contained in the Scheduling Order be extended by 30 days. Specifically, we request that the discovery completion date be extended from August 16, 2021 to September 15, 2021, and that the dispositive motion date be extended from September 13, 2021 to October 13, 2021.

The parties have worked diligently and cooperatively in discovery and are continuing to do so. Additional time is necessary, however, to complete depositions. The parties anticipate three party depositions and two to three non-party depositions. This is the parties' second request for an extension of the Scheduling Order, and we do not anticipate the need for further extensions.

Respectfully,



Michael J. Willemin